

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

ANDREW CORZO, SIA HENRY, ALEXANDER  
LEO GUERRA, MICHAEL MAERLENDER, BRANDON  
PIYEVSKY, BENJAMIN SHUMATE, BRITTANY  
TATIANA WEAVER, and CAMERON WILLIAMS,  
individually and on behalf of all others similarly situated,

*Plaintiffs,*

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF  
TECHNOLOGY, UNIVERSITY OF CHICAGO, THE  
TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY  
OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES  
OF DARTMOUTH COLLEGE, DUKE UNIVERSITY,  
EMORY UNIVERSITY, GEORGETOWN UNIVERSITY,  
THE JOHNS HOPKINS UNIVERSITY,  
MASSACHUSETTS INSTITUTE OF TECHNOLOGY,  
NORTHWESTERN UNIVERSITY, UNIVERSITY OF  
NOTRE DAME DU LAC, THE TRUSTEES OF THE  
UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH  
RICE UNIVERSITY, VANDERBILT UNIVERSITY, and  
YALE UNIVERSITY,

*Defendants.*

Case No. 1:22-cv-00125-MFK

Judge Matthew F. Kennelly

**DECLARATION OF STEVEN WEISBROT, ESQ. OF ANGEION GROUP LLC  
REGARDING CORNELL ALUMNUS CORRESPONDENCE**

I, Steven Weisbrot, Esq., hereby declare under penalty of perjury as follows:

1. I am the President and Chief Executive Officer at the class action notice and claims administration firm Angeion Group, LLC (“Angeion”). Angeion specializes in designing, developing, analyzing, and implementing large-scale legal notification plans.
2. I am familiar with the facts set forth herein based on personal knowledge, as well as information that has been provided to me by my colleagues in the ordinary course of business at Angeion.
3. Background information on my professional experience and Angeion’s expertise with the design and implementation of hundreds of court-approved notice and administration programs, including some

of the largest and most complex notice plans in recent history, is set forth in my prior declaration submitted with the preliminary approval motion of the University of Chicago Settlement. *See* August 14, 2023 Declaration of Steven Weisbrot, Esq. of Angeion Group LLC re the Proposed Notice Plan, ¶¶ 3-10 & Exhibit A (ECF No. 428-7).

4. The purpose of this declaration is to provide the Court with information concerning the correspondence between a Cornell alumnus (hereinafter “Cornell Alumnus”) and the Court, along with the email notice process.

#### **SETTLEMENT CLASS MEMBER CORRESPONDENCE**

5. On March 13, 2025, Angeion was informed that a Cornell Alumnus had contacted the Court regarding the notice process, stating that he had not received notice and was therefore unable to submit a claim before the deadline.

6. After reviewing the inquiry, Angeion confirmed that the Cornell Alumnus was included as a potential Settlement Class member on the list of names and contact information of potential Settlement Class Members provided by Defendants.

7. On November 8, 2023, Angeion received one (1) electronic file from Cornell University containing the names, mailing addresses, and email addresses, where available, of individuals likely to be Settlement Class members. The data file included a record for the Cornell Alumnus, which contained one email address and one mailing address. Following initial email validation efforts, it was determined the email address provided for the Cornell Alumnus was valid.

8. Accordingly, on March 29, 2024, Angeion emailed the Court-approved Notice of Proposed Class Action Settlement to the email address provided for the Cornell Alumnus. According to Angeion’s records, the email notice was delivered on March 29, 2024, and opened at 4:32:57 p.m. ET that day.

9. On July 20, 2024, the Court issued an Order approving the Settlements with Brown, Chicago, Columbia, Dartmouth, Duke, Emory, Northwestern, Rice, Vanderbilt, and Yale (ECF No. 726).

10. Accordingly, on September 15, 2024, Angeion emailed the Court-approved Notice of Approved Class Action Settlement to the same email address provided for the Cornell Alumnus. According to Angeion’s records, the email notice was delivered and opened, and the hyperlink to the Settlement Website ultimately clicked on September 15, 2024, at 9:23:47 a.m. ET.

11. On January 24, 2025, the Court issued an Order approving the Settlements with Caltech and Johns Hopkins (ECF No. 782).

12. Accordingly, on February 22, 2025, Angeion emailed the Court-approved Notice of Proposed Class Action Settlement to the email address provided for the Cornell Alumnus. According to Angeion's records, the email notice was delivered on February 22, 2025, and opened at 3:09:51 p.m. ET that day.

13. According to the Cornell Alumnus' Affidavit filed with the Court on March 13, 2025, they received the Notice of Proposed Class Action Settlement for the Caltech and Johns Hopkins settlements on February 22, 2025. The exhibit attached to the Affidavit indicates a delivery time of 11:09 a.m. on February 22, 2025. The Cornell Alumnus' Affidavit indicates they reside in Alaska, which is four hours behind Eastern Time. As such, Angeion's deliverability records align with the delivery information provided in the Cornell Alumnus's records.

#### **EMAIL NOTICE PROCESS**

14. Angeion leverages AWS Simple Email Service (SES) with Amazon Simple Notification Service (SNS) to track email delivery, opens, and clicks with high accuracy. SES provides real-time event notifications for deliveries, bounces, and complaints, while open and click tracking is enabled through unique tracking pixels and link redirections. The email tracking system is backed by AWS's secure and industry-standard infrastructure and the reporting is based on verifiable data directly from AWS.<sup>1</sup>

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: MARCH 18, 2025

  
STEVEN WEISBROT

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<sup>1</sup> See AMAZON, *Amazon SES Email Sending Metrics FAQs* (last visited Mar. 16, 2025), <https://docs.aws.amazon.com/ses/latest/dg/faqs-metrics.html>.